

KM&M
KAUFF MCGUIRE MARGOLIS LLP
950 THIRD AVENUE • FOURTEENTH FLOOR
NEW YORK, NY 10022

DIRECT DIAL: (212) 909-0703
DIRECT FAX: (212) 909-3503
COYNE@KMM.COM

TELEPHONE (212) 644-1010

FAX (212) 644-1936

NEW YORK

LOS ANGELES

June 29, 2023

VIA ECF AND VIA E-MAIL (FAILLA_NYSDCHAMBERS@NYSD.USCOURTS.GOV)

Hon. Katherine Polk Failla
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: *Cunningham and Davis v. Paramount Global*
Index No. 22-cv-05917
KM&M File No. 08327.9229

Dear Judge Failla:

As counsel to Defendant in the above-referenced action, we write in response to Plaintiffs' letter filed on June 26, 2023, specifically responding to an issue raised before this Court regarding an inadvertently disclosed privileged document. We respectfully request leave from the Court to file our letter in response to Plaintiffs' June 26th letter regarding the inadvertently disclosed document under seal, which includes the document at issue.

Thank you for your consideration in this matter.

cc: Edward Cerasia, II (Attorney for Plaintiffs)
Mika Hilaire (Attorney for Plaintiffs)

Respectfully submitted,

/s/ Michele A. Coyne
Michele A. Coyne

Application GRANTED in part and DENIED in part. Defendant is instructed to file its letter response on the public docket, and may file only the document at issue as an exhibit under seal, viewable to the Court and parties only. The Clerk of Court is directed to terminate the pending motion at docket number 34.

SO ORDERED.

Dated: June 30, 2023
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE